

Dean Health Insurance, Inc. / Dean Health Plan, Inc.  
Policies and Procedures

<b>Title</b>	Compliance Education and Training Programs	<b>P&amp;P #:</b>	CC - 08
<b>Product Line</b>	All products	<b>Effective Date</b>	February 1, 2015
<b>Department</b>	Compliance	<b>Next Review Date</b>	July 1, 2018
<b>Initially Developed by</b>	Kathy Johnson	<b>Date</b>	March 2005
<b>Last Revised by</b>	Elizabeth Andrews	<b>Date</b>	July 1, 2017
<b>Last MCO Approval</b>	Elizabeth Andrews	<b>Date</b>	July 1, 2017
<b>Last CCO Approval</b>	Stephanie Cook	<b>Date</b>	July 5, 2017

**Policy:** Dean Health Insurance, Inc./Dean Health Plan, Inc. (together “Dean”) requires its employees, contractors, members of the Board of Directors and first tier, downstream and related entities (“FDRs”) to complete certain training programs, such as HIPAA, FWA and general compliance training within 90 days of hire, appointment, or contracting and annually thereafter. Per CMS, training is required as Element III of an effective compliance program.

**Regulatory References:** 42 CFR §§422.503(b)(4)(vi) and 423.504(b)(4)(vi); Medicare Managed Care Manual Chapter 21 – Compliance Program Guidelines and Prescription Drug Benefit Manual Chapter 9 – Compliance Program Guidelines §50.3.

**Definitions:** See CC-01

**Procedures:**

- 1) Employee and Contractor Training
  - a) Once an individual is assigned the training modules in LMS, he/she has 30 days to complete the training. If an individual is on leave when the training modules are assigned, the individual must complete the training within 30 days of returning to work.
  - b) A training module is not considered complete until a score of at least 80% is attained.
  - c) The training content is reviewed and updated annually or more frequently, if needed. All changes are approved by the CCO.
  - d) The training consists of four modules:
    - i. HIPAA Privacy and Security. This module addresses topics that include:
      - a. Meaning of Protected Health Information (“PHI”);
      - b. Restrictions on the use and disclosure of PHI;
      - c. Administrative, physical and technical safeguards; and

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- d. Expectations and mechanisms for reporting HIPAA privacy violations.
  - ii. FWA. This module addresses topics that include:
    - a. How to ensure compliance with FWA statutes, the Anti-Kickback Statute, the False Claims Act, and other laws and regulations that govern activities in the healthcare industry;
    - b. Expectations and mechanisms for reporting FWA; and
    - c. Types of FWA that may occur at Dean.
  - iii. General Compliance. This module addresses topics that include:
    - a. SSM Health Code of Conduct and Ethics;
    - b. Dean's implementation of the elements of an effective compliance program;
    - c. Expectations and mechanisms for reporting potential or actual non-compliance; and
    - d. Discipline for violations of the SSM Health Code of Conduct and Ethics, policies and procedures, and regulatory requirements.
  - iv. Compliance Plan and SSM Health Code of Conduct and Ethics. This module provides these documents and requires the submission of an attestation.
- e) Ensuring Completion of Training
- i. New Hire
    - a. If a new employee or contractor does not complete the training within 30 calendar days of hire, Human Resources will follow up with the individual and their manager to ensure completion.
    - b. If a new employee or contractor does not complete the training within 90 calendar days of hire, Human Resources will notify Compliance via the Compliance Incident Reporting Form and Compliance will inform the DHI/DHP Compliance Committee at the next meeting. Such individual will also be suspended until the training has been completed.
  - ii. Annual
    - a. If an employee or contractor does not complete the training within the allotted 30 calendar day period, Human Resources will follow up with the individual and their manager to ensure completion.
    - b. If an employee or contractor does not complete the training within 90 days of being assigned the training, Human Resources will notify Compliance via the Compliance Incident Reporting Form and Compliance will inform the DHI/DHP Compliance Committee at the next meeting. Such individual will also be suspended until the training has been completed.
- f) Ad Hoc Training

